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May 1, 2015

Honorable Shira A. Scheindlin
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Garber, et al. v. Office of the Commissioner of Baseball, et al., 12-cv-3704 (SAS)

Dear Judge Scheindlin:

I write in response to Ms. Wilkinson's letter of April 29, 2015, regarding discovery that should have been produced but was inadvertently overlooked as a result of a technical error. The new production may involve as many as 10,000 documents, which is far from trivial. Plaintiffs cannot take a position on what effect these documents may have on the litigation, or what steps may need to be taken as a result, until they have had a chance to review them.

Sincerely,



Edward A. Diver

EAD/gg